



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION V

DATE: June 11, 1991

SUBJECT: Pagel's Pit, Winnebago County, Illinois, Risk Assessment Review

FROM: Erin Moran, Toxicologist
TSU

E Moran

TO: Bernard Schorle, RPM
IL/IN Section

I have completed my review of the Pagel's Pit Risk Assessment dated March, 1991 and have the following comments:

- A baseline risk assessment evaluates risk in the absence of institutional controls and any remedy. Various parts of the risk assessment evade this requirement.
- In attempting to rationalize why a well will not be not be used residentially in the future, p. 6-18 states that "Environmental Health personnel can only discourage well construction in areas of known groundwater contamination. If a well was constructed and contamination was detected which would be a health concern, the Health Department has the authority to condemn the well". CERCLA promotes permanent remedies and mandates protection of public health so one's health will not be dependant on the local environmental health personnel's historical knowledge of the area's contamination.
- P. 6-21 states that "The distance to the nearest downgradient well is approximately 2,000 ft. and groundwater contamination is currently attenuated within approximately 900 ft. downgradient of the site (i.e., in a westerly direction)". It is doubtful, considering the magnitude and variety of contamination and the level of uncertainty at this site, that the contamination has this rate of attenuation.
- Two uncertainties should be included in the risk assessment. The first is that many wells were included in calculating the groundwater exposure point concentration when there is a reasonable chance that a future residential well could be placed where the maximum concentration was detected. The second uncertainty is that the maximum detected concentration is probably not the truly highest concentration at the site.

It is important that these comments are addressed in the risk assessment. Please note that although this document has been reviewed for consistency with guidance, because of the extensive

number of chemicals of concern and exposure pathways, I did not confirm the accuracy of all of the arithmetic involved in the risk calculations. Please call me at 353-1420 if you would like to discuss these comments. Also, please complete the attached TSU critique form.

attachment

cc: S. Ostrodka

C R I T I Q U E S H E E T

To help the Technical Support Unit improve our service to you we would appreciate your response to the following questions:

Product: Risk Assessment Review.

Quality of product: Excellent Good Fair Poor

Did the product provide the information desired? Yes No

Did the product meet your technical needs? Yes No

Amount of information provided: Too much Sufficient Insufficient

Timeliness: Ahead of schedule On schedule Late

Comments:

Signature (optional)

Please return this sheet to Steve Ostrodka (5-HSM-147). Thank
you.

Tv67